

Exhibit C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MURASHEA BOVELL

Plaintiff,

Case No: 21-CV-01621 (PMH)(AEK)

- against -

**PLAINTIFF’S INITIAL
DISCLOSURES
PURSUANT TO F.R.C.P.
§ 26(a)**

CITY OF MOUNT VERNON, New York, GLENN SCOTT, individually and in his official capacity as Police Commissioner of the Mount Vernon Police Department, SHAWN HARRIS, individually and in his official capacity as former Police Commissioner of the Mount Vernon Police Department, RICHTON ZIADIE, individually and in his official capacity as Chief of Mount Vernon Police Department, GREGORY ADDISON, individually and in his official capacity within the Mount Vernon Police Department, MICHAEL KUSHNIR, individually and in his official capacity within the Mount Vernon Police Department, ANGELES CHEUNG, individually and in her official capacity within the Mount Vernon Police Department, GARY ISHKANIAN, individually, and in his official capacity within the Mount Vernon Police Department.

Defendants.
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Plaintiff MURASHEA BOVELL (“Plaintiff” or “Bovell”), by his attorney, Joseph W. Murray, Esq., as and for Plaintiff’s initial disclosures pursuant to F.R.C.P. § 26(a)(1) to the defendants in the above captioned matter. These disclosures are based upon information presently known and reasonably available to Plaintiff and which Plaintiff believes he may use in support of his claims. Continuing investigation and discovery may cause Plaintiff to amend/supplement these initial disclosures by identifying other potential witnesses, documents,

and other pertinent information to defendants. Plaintiff therefore reserves the right to amend these disclosures.

Plaintiff objects to any disclosure of information or documents beyond that which is required by the Federal Rule of Civil Procedure, the Federal Rules of Evidence, the Local Rules of the United States District Court for the Southern District of New York, or other applicable law, rule or order. By providing these initial disclosures, the Plaintiff does not represent that he is identifying every single document, tangible thing or witness that is relevant to the stated claims within this action. In addition, these disclosures are made without the Plaintiff in any way waiving his right to object to any discovery request or proceeding involving or relating to the subject matter of these disclosures on any grounds, including competency, privilege, relevancy, and materiality, hearsay, undue burden, confidentiality, or any other appropriate ground of objection. Further, these disclosures are not an admission by Plaintiff regarding any matter.

Each and every disclosure set forth below is subject to the above qualifications and limitations.

F.R.C.P. § 26(A) DISCLOSURES

F.R.C.P § 26(a)(1) (A)(i) the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

1. Name:
Sergeant Elio Rucci

Contact:
MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; Phone: 914-665-2500

Information
6th Notice of Claim. Gave plaintiff unjust/unfair evaluation knowing that plaintiff was injured in the line of duty, but Sgt. Rucci counted plaintiff's line of duty days as if they were regular sick days. This was appealed by plaintiff but has still not been corrected. This involves approximately 60 sick days wrongfully debited from plaintiff's sick leave balances. Line of Duty sick days are not deducted from plaintiff's sick leave balances.

2. Name:
Chief Marcel Olifiers

Contact:
MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; Phone: 914-665-2500

Information:
6th Notice of Claim. Chief was involved in plaintiff's appeals of plaintiff's unjust/unfair evaluation and conversion of plaintiff's sick leave balances. Informed plaintiff that he would reimburse plaintiff's sick leave balances but bit still has not been remedied.

3. Name:
Lieutenant Robert Wuttke

Contact:
MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; Phone: 914-665-2510

Information:
Involved in the police corruption within the MVPD

4. Name:
Police Commissioner Shawn Harris

Contact:

1 Hill Ave, Washingtonville, NY 10992; Phone: 914-879-5788

Information:

Involved with police corruption and retaliation against plaintiff. Directed plaintiff to submit to bogus fitness for duty exams; ordered plaintiff to surrender his firearms; placed plaintiff on involuntary unpaid leave; denied plaintiff due process of law in failing to hold a Civil service Law § 72 hearing, despite due demand for same.

5. Name:

Lieutenant Paul Nawrocki

Contact:

82 Orchard Road, Mahopac, NY 10541

Information:

Involved with police corruption and retaliation against plaintiff. Conspired with Police Commissioner Shawn Harris to retaliate against plaintiff.

6. Name:

Police Officer John Campo

Contact:

MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; Phone: 914-665-2510

Information:

He witnessed police corruption and even participated in police misconduct at MVPD. Plaintiff had recorded conversations between him and PO Campo which are provided bellow.

7. Name:

Chief Richton Ziadie

Contact:

3609 Boller Avenue, Bronx New York

Information:

Witnessed police corruption and retaliation against plaintiff. Plaintiff recorded a conversation between Chief Ziadie and plaintiff in which Chief Ziadie informed plaintiff that it was Police Commissioner Shawn Harris who orchestrated the retaliation against plaintiff.

8. Name:
Dr. Gary Ishkanian

Contact:
12 North 7th Avene, Mount Vernon, New York

Information:
Part of the corruption with the MVPD in wrongfully denying plaintiff his line of duty medical benefits and failed to approve medical treatment for plaintiff's line of duty injury.

9. Name:
Dr. Angeles Chung

Contact:
445 Park Avenue, New York, New York 10222

Information:
MVPD Psychological doctor who conducted the bogus fitness for duty examination and prepared the report that resulted in the wrongful removal of plaintiff's firearms and being placed on unpaid medical leave.

10. Name:
Lieutenant Gregory Addison

Contact:
MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; Phone: 914-665-2510

Information:
Part of the police corruption and retaliation against plaintiff. He was present when plaintiff discovered the small rubber rat which was placed near plaintiff's locker in the locker room and ran out laughing out loud. He was also present during roll call when Sgt. Kushnir called plaintiff a rat. Both Sgt Kusnir and Lt. Addison were laughing about it in the hallway, while looking at plaintiff. He also played a roll in the denial of plaintiff's line of duty medical treatment. Lt. Addison was present when plaintiff appealed his unjust/unfair evaluation in or around 2020. Plaintiff provided the conversion documents to Lt. Addison in order to have his sick days restored. Ordered plaintiff in to submit to an improper drug test.

11. Name:
Sergeant Michael Kushinir

Contact:

9 Sharon Way, Yonkers, New York

Information:

Part of the police corruption and retaliation against plaintiff. Sgt. Kushinir called plaintiff a rat in front of other officers at roll call. He was then suspended and retired.

12. Name:
Chief Steven Sexton

Contact:

MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; Phone: 914-382-9667

Information:

Spear headed team to fight against corruption within the MVPD against Chief Richtton Zadie and others. He wrote plaintiff's injury report which he modified it negatively against plaintiff as a result of pressure from Deputy Chief Rolland.

13. Name:
Detective Allen Patterson

Contact:

MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; 929-3433-8021

Information:

Witnessed corruption within the police department, including the narcotics unit. He is also on recorded conversations with plaintiff talking about police misconduct.

14. Name:
Sergeant Jean-Jerome

Contact:

MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; 914-490-5938

Information:

PBA representative: Witnessed police corruption within the police department and how plaintiff was mistreated.

15. Name:
Sergeant Brent Gamble

Contact:

MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; 914-403-9196

Information:

Former PBA President; was aware of the police corruption and retaliation against plaintiff.

16. Name:
Detective Alec Francis

Contact:

MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550

Information:

Knew about police corruption and retaliation against plaintiff. As Internal Affairs officer, he was present at depositions in plaintiff's prior related lawsuit. Compelled plaintiff to submit to non-random (as per PBA contract) drug test.

17. Name:
Detective Anthony Burnett

Contact:

MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550

Information:

Compelled plaintiff to submit to non-random (as per PBA contract) drug test.

18. Name:
Detective Benny Gutierrez

Contact:

MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; 914-665-2500

Information:

Knows about detailed corruption within the MVPD

19. Name:
Sergeant Sean Fagan

Contact:

MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; 914-665-2500

Information:

Facilitated, encouraged and engaged in corruption within the MVPD

20. Name:
Dispatcher Twana Richards
- Contact:
MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; 914-665-2500
- Information:
Knows about and witnessed corruption in the City.
21. Name:
Robert J. Ponzi
- Contact:
1133 Westchester Avenue, Suite N-202, White Plains, NY; (914) 505-6122
- Information:
Participated in and steered various corrupted hearings on behalf of MVPD City of Mount Vernon, was also disbarred.
22. Name:
Dr. Sanjiv Bansal
- Contact:
2705 Williamsbridge Road, Bronx, New York 10469; (718) 515-9800.
- Information:
Is aware of corruption by MVPD use of medical needs as a means of retaliation or management tool.
23. Name:
Captain Roy Hastings
- Contact:
MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; 914-665-2500
- Information:
Is aware of and participated in corrupt practices within the MVPD
24. Name:
Detective Avion Lee
- Contact:
MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; 914-665-2500

Information:

Is aware of corrupt practices within the MVPD

25.

Name:

Police Officer Joseph Diaz

Contact:

MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; 914-665-2500

Information:

Is aware of and witnessed corrupt practices within the MVPD

26.

Name:

Police Officer George Monge PBA

Contact:

MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; 914-665-2500

Information:

Is aware of corrupt practices within the MVPD

27.

Name:

Police Officer Daniel Denenedicts PBA

Contact:

MVPD 2 Roosevelt Sq N. Mount Vernon, NY 10550; 914-665-2500

Information:

Is aware of corrupt practices within the MVPD

28.

Name:

Dr. Gregory I. Mack, PhD.

Contact:

220 Route 6, Mahopac, NY 10541; 845-282-3367

Information:

Treatment provider to plaintiff

29.

Name:

Cindy Maric, LCSW

Contact:

731 Saw Mill River Road, Suite 7, Ardsley, NY 10502; (516) 330-1818

Information:

Treatment provider to plaintiff

F.R.C.P § 26(a)(1) (A)(ii) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

List of Disclosures

The documents listed below will be provided electronically within the separate folders consistent with the numbered paragraphs. For example, there is a folder entitled “Additional Documents” containing documents “a” through “jj” as indicated below, and so forth with each numbered folder below.

1. Additional Documents

- a. 1-2-2018 MVPD Harassment Complaint
- b. 1-10-19 Judge Fufido Gun License Order
- c. 2-4-19 Lohud Article on Joseph Speizio Driving with
- d. 2-5-19 Letter Emailed 2-8-19-mailed 2-20-19 to Inv Paola Toro Division of Human
- e. 2-16-09 My MVPD Harassment Complaint Against Sgt. Podzus
- f. 2-21-19 Article on Joseph Speizio Judgement violati
- g. 3-06-19 3rd Email 3rd Notice of C sent to Mayor Tho
- h. 3-6-09 Letters from Dep Chief John Roland
- i. 3-12-19 Harris Letter
- j. 3-15-19 Article on News12 Commissioner Shawn Harris
- k. 3-19-19 Defendants Brief
- l. 3-20-10 Bovell Response to RTW
- m. 4-4-19 Leave without Pay Order
- n. 4-9-18 Email to LT Nawrocki -Commissioner Harris to
- o. 4-10-18 BOVELL EMAIL MVPD2018 ACCOUNTABILITY
- p. 4-10-18 BOVELL MVPD2018 ACCOUNTABILITY
- q. 4-16-18 Letter FFD Exam letter from Commis Harris
- r. 4-16-19 Sgt Exam Denial
- s. 4-22-18 MV5 to MVPD COMMISSIONERS-MAYOR-CITY- CURROPTION IN MVP

- t. 4-26-17 Return to work Letter from Police Commissioner
- u. 4-26-18 Complaint to COMMISSIONERS-MAYOR-MVPD CITY
- v. 5-3-19 Bovell Letter Re: Medical Records
- w. 5-5-14 Sgt Wutkle Evaluation of Officer
- x. 5-11-16 Dr. Toterio IME Physical-Knees
- y. 5-20-2021 Bovell Physical Therapy Prescription – Dr Bansal
- z. 5-20-2021 Bovell Return to Work Letter – Dr Bansal
- aa. 5-22-18 Letter-Complaint to HR Commissioner 1
- bb. 6-12-18 Appeal to return to work letter from Commissioner Harris
- cc. 6-15-18 Appeal letter to Commissioner Harris-Spezio-Mayor Thomas-Corruption
- dd. 6-25-18 Invol-Leave of absence letter from Commish Harris
- ee. 6-25-18 Letter from Harris Unfit for Psyche Reason
- ff. 7-5-18 Letter to Comm Harris Appeal Leave without Pay
- gg. 7-5-18 Response appeal Letter to Commissioner Harris Leave without pay
- hh. 7-24-18 Pistol Lic Revocation Order
- ii. 8-1-18 Cindy Romano Letter- Bovell No threat
- jj. 8-2-18 Dr Gregory Mack Phd Addendum report of Bovell
- kk. 8-2-18 Dr Gregory Mack Report – Bovell
- ll. 8-2-18 Dr Gregory Mack Resume
- mm. 8-9-18 FFD Exam by Dr Paul Gunser -Officer Bovell
- nn. 11-6-17 BOVELL ADMIN DAY REQUEST
- oo. 11-14-19 Fax to Dr Ishkanian for Dr Toterio Rep and
- pp. 11-21-18 Email to PBA president Gamble to file Gre
- qq. 11-26-18 Email to from PBA president Gamble refusal
- rr. 12-10-17 MVPD Harassment Complaint
- ss. 12-19-18 Email Letter to LT Nawrocki and others reg
- tt. 12-19-18 Letter to LT Nawrocki and others regarding my checks-s
- uu. 12-21-19 Email with Property voucher From Nawrocki
- vv. 2017 Emails to Officer Cruz for Vacation Transfer
- ww. 2018-4-16 Letter FFD Exam Letter from Comm Harris
- xx. BOVELL 4-16-18 MV5 207C ADDITIONAL REQUEST
- yy. Emails Request Union Assistance
- zz. Sgt McEachin Evaluation Narcotics 7-3-2012
- aaa. Sgt Wuttke Amended Evaluation
- bbb. Text to Chief

2. Article 78 Exhibits

- a. 2008-12-13 MV5 Lt Mangeri Ordering to get Specific Amt of Summonses
- b. 2009-1-19 MV5 Sgt Curzio and Podzus Placing me on Walking Post

- c. 2009-1-19 MV5 Sgt Podzus Sgt Curzio Threatened Me that I will pay
 - d. 2009-2-MVPD Harassment Policy and Complaint Form
 - e. 2009-2-12 MV5 Sgt Podzus and Sgt Curzio Retaliating Placing Me On
 - f. 2009-2-15 MV5 Incident #091058 Sgt Podzus Harassing Me by Accusing me of running
 - g. 2009-2-16 My MVPD Harassment Complaint Against Sgt Podzus
 - h. 2009-3-6-Letters from Dep Chief John Roland
 - i. 2009-3-11 MV5 Meeting with Chief Duncan about Harassment by Sgt Podzus
 - j. 2009-3-26 MV5 About Meeting with Chief Duncan on 3-11-09
 - k. 20120703 Sgt McEachin Evaluation Narcotics
 - l. 2014-3-29 MV5 Dis Retaliation
 - m. 2014-3-31 Email Containing MV5 Conver Addressed to Comm Raynor Wu
 - n. 2014-5-5 Sgt Wutkke Unfair and Retaliatory Evaluation of Officer
 - o. 2015-2-5 Sgt Wuttke Amended Evaluation
 - p. 2017-12-10 MVPD harassment Complaint
 - q. 2018-1-2 MVPD Harassment Complaint New City Council
 - r. 2018-6-25 Note to Only Include June 25 2018 Letter 6-25-18 Invol-Leave of Absence Letter from ...
 - s. 2018-7-5 Response Appeal Letter to Commissioner Harris Leave without Pay
 - t. 2018-7-24 Pistol License Revocation-Appearance
 - u. 2019-3-20 Bovell Response to RTW Letter from MVPD
3. Drug Test
- a. 2020-12-4 Independent Drug Test Quest
 - b. 2020-12-5 Bovell Urine Drug Test Results Quest Diagnostics
4. EEOC
- a. Doc-1 Bovell 520-2014-02659 EEOC Charge 7-29-14
 - b. Doc-2 5-31-18 Signed Charge of Discrimination
 - c. Doc-3 11-20-18 Notarized EEOC Dept of Human Rights Complaint – Transe
 - d. Doc-4 6-15-19 EEOC DHR Dated 6-11-19 Final Determination
 - e. Doc-5 6-25-19 Request for Review EEOC
 - f. Doc-6 3-16-2020 Bovell DHR #10197813 Revised determination and EEOC 520-2018-03777
 - g. Doc-8 11-4-2020 Case 520-2018-03777 Division of Human Right Determination Revised Again Received 7-10-20
 - h. Doc-9 11-22-2020 Bovell 520-2018-03777 EEOC-DHR 10209899 Request for Review-Right to Sue
 - i. Doc-10- 11-24-2020 EEOC Notice of Right to Sue Letter Received 11-30-2020

5. Emails

- a. 2020-11-5 Glen Scott Email-1
- b. 2020-11-5 Glen Scott Email-2
- c. 2020-12-4 Email re Voided Drug Specimens

6. MV5

- a. 1-19-09 MV5 Sgt Curzio and Podzus Placing Me on Walking Post to
- b. 1-19-09 MV5 Sgt Podzus Sgt Curzio Threatened Me that I will Pay
- c. 2-12-09 MV5 Sgt Podzus and Sgt Curzio Retaliating Placing Me on
- d. 2-15-09 MV5 Incident #091058 Sgt Podzus False Accusation
- e. 3-11-09 MV5 Meeting with Chief Duncan on 3-11-09\12-13-08 MV5 Lt Mangeri Ordering to Get Specific Amount of Summons
- f. Bovell MV5 Sick Time Conversion Request to LOD - April 2019 to May 29 2019 30 days
- g. Bovell MV5 Sick Time Conversion Request to LOD- March 31 2019 to April 1 2020 59 days
- h. Bovell MV5 Sick Time Conversion Request to LOD - Sept 28-2020 to Oct 1- 2020- Oct 30-2020 to Oct 31 2020 6 days
- i. Bovell MV5-4 FORM Sick Time Conversion Request April 15-2019 to May 29-2019 -30 days
- j. Bovell MV5-4 FORM Sick Time Conversion Request March 31-2019 to April 1-2020
- k. Bovell MV5-4 FORM Sick Time Conversion Request Oct 20-2020 to Oct 21- 2020 - 2 days
- l. Bovell MVS-4 FORM Sick Time Conversion Request Sept 1 2020 to Oct 1 2020 4 days
- m. MV5 Dis Retaliation

7. MVPD2018

- a. 1-2-2018 MVPD Harassment Complaint New City Council
- b. 3-6-2009 Letter from Deputy Chief Roland
- c. 4-9-18 Return to Work Order Email to MVPD Admin
- d. 4-12-18 Accountability MV5
- e. 4-22-18 MV5 to MVPD Commissioner-Mayor-City-Corruption in MVPD
- f. 4-26-17 Return to Work Light Duty Letter and Envelope Dated 4-2
- g. 4-26-18 Complaint to Commissioner-Mayor-City-Corruption in MVPD
- h. 5-10-18 APPEAL Bovell vs Mt Vernon Case 7-15-CV-08594-CS
- i. 5-22-18 Letter-Complaint to HR Commissioner 1
- j. 5-26-17 Letter to Coughlin & Gerhart- Dr Debiec Stay Out of Work
- k. 5-31-18 Signed Charge of Discrimination

- l. 6-12-18 Appeal to Return to Work Letter from Commissioner Harris
- m. 6-15-18 Appeal Letter to Commissioner Harris-Speizio
- n. 6-15-18 Letter to Commissioner Harris
- o. 6-25-18 Invol-Leave of Absence Letter from Commish Harris
- p. 7-5-18 Response Letter to Commissioner Harris Leave without Pay
- q. 7-26-18 Copy of Pistol Permit
- r. 7-26-18- Pistol -Rifle - Property Sheet to Dutchess Sheriff
- s. 12-10-17 MVPD Harassment Complaint
- t. 2018-4-16 Letter FFD Exam Letter from Commis Harris
- u. Bovell 4-16-18 207C Additional Request
- v. Bovell MVPD2018 Accountability
- w. Cruz Emails denied Vacation Transfer by Commish 2017
- x. Letter Dated 4-16-18 from Commissioner Harris FFD Exam Stamped 4
- y. Letter dated 6-25-18 Place on Leave No Pay received 7-3-18
- z. May 2018 EEOC Inquiry - Stamped on Office Visit

8. Photos

- a. Paste
- b. Rat Picture
- c. Text to Chief

9. Recordings

- a. 2018-4-24 Physc IME Dr Angeles M Cheung
 - i. 4-24-18 Physc IME FFD Part 1
 - ii. 4-24-18 Physc IME FFD Part 2
 - iii. 4-24-18 Physc IME Part 3 Dr
- b. Det Patterson
 - i. 3I
 - ii. 3T
 - iii. 3U
 - iv. 3V
 - v. Incoming Call – Det. Patterson (Antonini beat up) - 20170611_203319
 - vi. Outgoing Call – Det. Patterson - 20171115_092954
 - vii. Outgoing Call – Det. Patterson - 20171115_174445
- c. PO Campo
 - i. 2H
 - ii. 2P
 - iii. 2Q
 - iv. 3P

- v. 4H
 - vi. 6E
 - vii. Incoming Call – P.O. Campo TAPE 2 - 20180105_230959
 - viii. Incoming Call – P.O. Campo TAPE 3 - 20180105_232103
 - ix. Outgoing Call – P.O. Campo TAPE 1 - 20180105_215815
- d. PO Evans
 - i. 4F
- e. PO Lee
 - i. Outgoing Call – P.O. Lee - 20170425_163115
- f. 4-11-18 MVRP id
- g. 4-11-18 Outgoing Call – MVRP Desk - 20180411_080953
- h. 4-25-18 IME Doctor Totero FFD
- i. 8-7-19 Sgt Michael Kushner Calling Me a Rat at Roll Call 3 min 18 sec
- j. 8-8-19 Sgt Michael Kushner Calling Me a Rat during Roll Call 2 min 27 sec
- k. Incoming Call – P.O. Campo TAPE 2 – 2018
- l. Incoming Call – P.O. Campo TAPE 3 – 2018
- m. Outgoing Call - P.O. Campo - 2018 Commissioner Cover up
- n. Outgoing Call - P.O. Campo - 20180208_201317 Giving the Names- Harris FBI Lie Detector Test
- o. Outgoing Call - P.O. Campo TAPE 1 - 20180105_215815

10. Recordings of Glen Scott

- a. 2020-1-15 Meeting with Commissioner Scott 20200115185449-068
- b. January 15-2020 Meeting with Commissioner Scott 20200115185449-068
- c. Transcript of Partial Recording of Glen Scott 14 mins 50 sec – 16 mins 38 sec

11. Therapist Cindy Romano-Maric LCSW Docs

- a. 7-16-18 M. Bovell signed HIPPA Release for M. Bovell
- b. 7-16-18 M. Bovell signed HIPPA Release for Psch Gregory Mack Ph.D.
- c. 7-26-18 M. Bovell Signed HIPPA Release Cindy to speak to my Attorney

F.R.C.P § 26(a)(1) (A)(iii) a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under [Rule 34](#) the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and

To be provided under separate cover

F.R.C.P § 26(a)(1) (A)(iv) for inspection and copying as under [Rule 34](#), any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Upon information and belief, the City of Mount Vernon is self-insured as to line of duty medical treatment of its officers and Plaintiff has United Healthcare NYSHIP and Blue Cross Blue Shield for personal medical insurance

Dated: Nassau, New York
January 21, 2022

Respectfully submitted,



By: _____
Joseph W. Murray, Esq.
Attorney for Plaintiff Murashea Bovell
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